

**Before the  
Federal Communications Commission  
Washington, DC 20054**

**In the Matter of:**

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|--|---|----------------------|
| Inquiry Concerning the Deployment of Advanced    | ) |                      |
| Telecommunications Capability to All Americans   | ) |                      |
| in a Reasonable and Timely Fashion, and Possible | ) | GN Docket No. 16-245 |
| Steps to Accelerate Such Deployment Pursuant to  | ) |                      |
| Section 706 of the Telecommunications Act of     | ) |                      |
| 1996, as Amended by the Broadband Data           | ) |                      |
| Improvement Act                                  | ) |                      |

**Comments of the American Library Association**

The American Library Association (ALA) is the world’s oldest and largest library association representing over 58,000 members—many of whom work in our nation’s over 16,000 public libraries. We appreciate the opportunity to comment on this important proceeding.

As the Commission states, this inquiry is to determine if “advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion.”<sup>1</sup> The federal E-rate program is critical in helping make this determination for our libraries and schools. During the major review and modernization process of the E-rate program in 2014, ALA filed numerous comments and overall we are pleased with the Commission’s consequent reforms made to the program. Our purpose in this filing is not to review or reiterate the many E-rate reforms, but to focus on one particular subject that is highlighted in this Section 706 inquiry. That subject is section II C of the inquiry which is titled: “Criteria and Standards for School and *Library* Broadband Access” (emphasis added). We note in reviewing this section there is narrative and discussion on school broadband issues but no reference at all to libraries. Thus we want to take the opportunity to correct this omission and further put forth in these comments a proposal to refine the broadband benchmark target for libraries that was articulated in the E-rate program’s *Modernization Order*.<sup>2</sup>

Section II C of the 706 inquiry references the broadband standards the Commission established in the E-rate modernization process. In brief, for schools it adopted a two-tiered broadband speed benchmark of 100 Mbps per 1,000 students and staff in the short term; and 1 Gbps per 1,000

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<sup>1</sup> 47 U.S.C. § 1302(b).

<sup>2</sup> *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, para. 34 (2014) (*E-rate Modernization Order*).

students and staff in the long term.<sup>3</sup> For libraries it adopted a bandwidth target based on community population. For libraries serving less than 50,000 population it recommended a minimal broadband speed of 100 Mbps and for libraries serving more than 50,000 population it recommended they have at least 1 Gbps.<sup>4</sup> We ask that the library goals be included in this inquiry. Additionally, we encourage the Commission to include data commensurate with school data to describe library progress toward the 100 Mbps and 1 Gbps goals.

Though these goals are useful at the aggregate level for public policy purposes, more granular bandwidth targets are needed for the library practitioner community. In the two years since the benchmarks were adopted, ALA has come to the conclusion that in addition to these broad goals, a more practical bandwidth target would be based on the number of Internet connected devices. In the *Modernization Order* the Commission's adoption of 1 Gbps per 1,000 students roughly equates to 1 Mbps per student. A library bandwidth target of 1 Mbps per Internet connected device would dovetail neatly with the Commission's bandwidth target for schools.<sup>5</sup> Furthermore, this idea is also based on direct conversations and interactions we have had more recently with the public library community. Here are several examples:

- Ninety-five per cent (362) of Wisconsin's public libraries are in communities under 50,000 population. In these libraries the number of Internet connected computers range from a low of just three to a high of 71. With this wide variation it is of limited value to tell these 362 libraries they all should seek to have a minimal broadband speed of 100 Mbps.<sup>6</sup> In addition, 90% of all public libraries are connected to BadgerNet, the state's broadband network. In 2017 BadgerNet will undergo a major upgrade and the State Library will use the number of Internet connected computers in each library to help determine the library's bandwidth on the enhanced network.
- In working with state library staff involved in ALA's Leap Project,<sup>7</sup> it has become evident that talking about a per device bandwidth metric is helpful to librarians in the field because it allows them to better determine their libraries' bandwidth needs and thus plan more strategically for broadband upgrades to reach the adopted goals.
- In recent (August 2016) correspondence to ALA, Adam Clotfelter, Database and Applications Administrator for the Pikes Peak (CO) Library District stated, "We are assessing our broadband needs but the current guideline of 1 Gbps for populations greater than 50,000 by itself *doesn't offer us much help*, especially when this is applied to a multi-branch library system where the population may be an order of magnitude greater."

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<sup>3</sup> *E-rate Modernization Order*, para. 34 (2014). The Commission adopted the bandwidth targets suggested by the State Education Technology Directors Association (SETDA).

<sup>4</sup> *E-rate Modernization Order*, para. 37 (2014).

<sup>5</sup> While the school bandwidth target refers to "students" this is based on the assumption that every student has an Internet connected device, often referred to as "1:1 computing."

<sup>6</sup> Using such a general, broad-brush measurement like community population also begs the question of why should a small library that currently never exceeds 20 Mbps have a 100 Mbps circuit? And how is it fiscally prudent to pay for excess capacity they do not need? This places unnecessary pressure on the library budget and the E-rate fund too.


<sup>7</sup> The Library E-rate Assessment and Planning (LEAP) project launched involves five participating state library agencies (Alaska, California, Iowa, Kentucky, and North Dakota). The overall purpose of the project is to identify barriers to participating in the E-rate program and increasing broadband capacity among their respective libraries. ALA staff are working closely with USAC staff on this project.

(Emphasis added) In response to this inquiry staff in ALA's Office for Information Technology Policy (OITP) recommended that Mr. Clotfelter use 1 Mbps per Internet connected device to help determine the library branch bandwidth needs.

We very much recognize that any bandwidth "target" must undergo regular review. And as the number of Internet services continues to increase (and the level of broadband demanded by each service) so any bandwidth "target" must increase accordingly. Basing a bandwidth target on Internet connected devices will be a useful metric because it is flexible and can thus change as Internet services continue to evolve. Our current suggested figure of 1 Mbps will likely increase to 1.5 Mbps, 2 Mbps, or even higher in the coming years.

In conclusion, we ask the Commission to explicitly incorporate the library standard into this inquiry. Moreover, as the Commission revisits these standards, we suggest it consider adoption of a standard that includes more granular guidance such as targets based on the number Internet connected devices.


Respectfully submitted,



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